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JOHN M. PELKEY
ADMITTED IN D.C. AND VA

August 24, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

OUR FILE NO.
0693-102-63

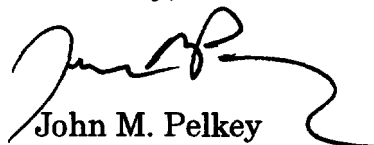
Re: Docket No. 93-136
RM-8161

Dear Mr. Caton:

Yesteday, this office filed with the Commission Reply Comments on behalf of Vero Beach FM Radio Partnership. Inadvertently omitted from those Reply Comments was the technical exhibit referred to herein. Attached hereto are five copies of the Reply Comments with the technical exhibit attached.

If there are any questions concerning this submission, please contact this office directly.

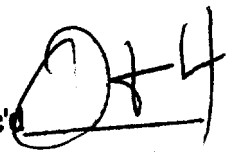
Sincerely,


John M. Pelkey

JMP/lgs

cc (w/encl.): Michael C. Ruger, Esq.
Ms. Nancy J. Walls
William J. Silva, Esq.
John Joseph McVeigh, Esq.
James M. Weitzman, Esq.
Robert J. Rini, Esq.
Mr. Charles A. Russell
Ms. Mary Kay Reich

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Before The
Federal Communications Commission
 Washington, D.C. 20554

RECEIVED

AUG 24 1993

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In The Matter Of)
)
 Amendment of Section 73.202(b))
 Table of Allotments,)
 FM Broadcast Stations,)
 (Key Colony Beach, Key Largo,)
 and Marathon, Florida)

Docket No. 93-136

RM-8161

TO: Chief, Allocations Branch
 Mass Media Bureau

**Reply Comments of
 Vero Beach FM Radio Partnership**

Vero Beach FM Radio Partnership ("Vero Beach FM"), through counsel and pursuant to Sections 1.415 and 1.420 of the Commission's rules, hereby files its Reply Comments with respect to the counterproposal submitted in the above-referenced proceeding by Okeechobee Broadcasters, Inc. ("Okeechobee"); Sunshine Broadcasting, Inc. ("Sunshine"), and Jupiter Broadcasting Corporation ("JBC") (referred to herein as the "Joint Counterproposal"). For the reasons set forth below, Vero Beach FM supports the Joint Counterproposal and asks the Commission to amend the Table of Allotments in accordance with that counterproposal.

I. HISTORY OF THE RULEMAKING

On December 17, 1992, Spanish Broadcasting System of Florida, Inc. ("Spanish"), petitioned the Commission to amend the Table of Allotments in such a manner as to specify changed frequencies for stations operating in Key Largo, Marathon, and Key Colony Beach,

Florida. Spanish, the licensee of the Key Largo station, WZMQ(FM), proposes that the channel used by WZMQ(FM) be changed from channel 280C2 to channel 292C2. According to the Petition for Rulemaking, the change in the Key Largo station's channel is necessitated by alleged receiver-induced third order intermodulation ("RITOI") interference being experienced in the vicinity of the WZMQ(FM) tower. That tower is shared with WKLG(FM). Operating from the shared tower, WZMQ(FM) and WKLG(FM) allegedly are causing RITOI interference to WCTH(FM), which operates from a transmitter site located approximately 19 kilometers from the WZMQ(FM)/WKLG(FM) tower. To effectuate its change, Spanish proposes that the reference coordinates of N24° 57' 20"; W80° 34' 50" be established as the reference coordinates for the Key Largo allocation. These reference coordinates are approximately 20 kilometers from WZMQ(FM)'s currently-licensed facilities.

By Notice of Proposed Rulemaking and Order to Show Cause, released June 3, 1993,¹ the Commission specified July 26, 1993 as the date for the submission of counterproposals and August 10, 1993 as the date for the submission of reply comments. On July 26, 1993, Okeechobee, Sunshine and JBC timely filed their Joint Counterproposal. Whereas the Spanish proposal had not proposed any upgrades for any of the three stations affected by its proposal and had made no assertions that its proposal would result in increased coverage, the Joint Counterproposal would permit three stations to upgrade their channels and would permit, according to Exhibit F to the engineering statement submitted as part of the Joint Counterproposal, the three upgraded stations to serve an additional 1.3 million people. Of immediate

¹ *Key Colony Beach, Key Largo and Marathon, Florida*, 8 FCC Red 3886 (1993).

importance to Vero Beach FM is the Joint Counterproposal's plan to substitute channel 292C3 for channel 258A at Jupiter, Florida.

On August 6, 1993, the Commission provided public notice of the Joint Counterproposal and specified that reply comments to the Joint Counterproposal could be filed within fifteen days.²

II. **THE VERO BEACH FM ALLOCATION**

Vero Beach FM is the permittee of WWDO(FM) in Vero Beach FM, Florida. WWDO(FM) is authorized to operate on channel 259C2. That channel was allocated to Vero Beach as a result of a rulemaking that culminated in the filing of competing applications in 1988.³ In order to effectuate that allocation, the Commission imposed site restrictions that severely limited the area within which the Vero Beach facility could be located. Further hindering the placement of the Vero Beach site was the fact that much of the area within which the site could be located was located either at the end of a runway or on parkland. Complicating the site placement situation yet further was the fact that, shortly before the effective date of the rulemaking allotting channel 259C2 to Vero Beach, the Commission modified the Table of Allotments to change the channel of station WKSJ-FM in Jupiter, Florida, from channel 296A to channel 258A.⁴

The Commission's decision to permit FM stations to use a contour protection scheme to overcome short-spacing somewhat enlarged the potential area within which the Vero Beach applicants could propose

² The fifteenth day occurred on a Saturday. As a result, pursuant to Section 1.4(j) of the Commission's rules, August 23, 1993 is the due date for the submission of reply comments. These Reply Comments are thus timely filed.

³ *Vero Beach, Florida*, 3 FCC Rcd 1049 (1988), *review denied*, 4 FCC Rcd 2184 (1989).

⁴ *See American Indian Broadcast Group, Inc.*, 5 FCC Rcd 7087, 7089 (1990).

construction of their facilities. Even then, however, the proposed facilities were required to operate at a lower height above average terrain ("HAAT") than would otherwise be necessary in order to protect other stations, most notably channel 258 in Jupiter.

The facilities authorized for use by Vero Beach FM are a case in point. Taking advantage of the contour protection scheme established in Section 73.215 of the Commission's rules, WWDO(FM) specified the use of a transmitter site in Sebastian, Florida. In order to protect channel 258 in Jupiter, however, WWDO(FM) was required to specify a HAAT of only 98 meters.

Adoption of the Joint Counterproposal would permit WWDO(FM) to raise its HAAT to 150 meters from 98 meters because WWDO(FM) would no longer be required to protect channel 258 in Jupiter. This increase in height would permit WWDO(FM) to serve a substantially increased area. As is explained in the attached "Technical Exhibit" of Bromo Communications, Inc., operation of WWDO(FM) at an HAAT of 150 meters would permit WWDO(FM) to serve an additional 66,479 persons--a twenty percent increase over the coverage that can be achieved by the presently authorized facility. In addition, the allocation of channel 292C3 in lieu of channel 258A at Jupiter would permit WWDO(FM) to move its facilities so as to decrease its coverage of over-water areas and increase its coverage of land areas.⁵

⁵ If the Joint Counterproposal were adopted, WWDO(FM) would file an application seeking an increase in its HAAT and would construct those facilities promptly upon their authorization.

III. The Alleged Intermodulation Interference Being Experienced By WCTH(FM) Can Be Eliminated Without The Channel Changes Proposed By Spanish.

Spanish claims that its proposed channel changes are required in order to eliminate RITOI interference allegedly being experienced by WCTH(FM). Spanish fails to recognize, however, that resolution of the RITOI problem can be accomplished in a much simpler fashion than requiring three stations to undergo channel changes.

The reference coordinates specified by Spanish for operation on Channel 292C2 define a site located more than 20 kilometers from Spanish's licensed facilities. Those reference coordinates are also located less than 1 kilometer from WCTH(FM)'s facility. Normally, RITOI problems can be overcome either by a change in channel or by placing greater geographic separation between the two stations that are causing the RITOI interference. In the present case, Spanish proposes to do both. There is no need to do so. As is pointed out in the attached Technical Exhibit, separation of the two stations yielding the interfering product by more than 20 kilometers should eliminate any RITOI interference to WCTH(FM).⁶

⁶ It should be noted that Section V-B of the FCC Form 301 requires applicants to take responsibility for any RITOI interference caused by the location of the applicant's transmitter within 10 kilometers of any other station's transmitter. Implicitly, the form recognizes that it is unlikely that RITOI interference will occur if the separation is greater than 10 kilometers. In the present case, the separation would be more than twice that.

Generally, RITOI interference will occur in that area where the stations yielding the interfering product have a very strong signal and the station on whose frequency the product is occurring has a relatively weak signal. Spanish itself recognizes this fact in the statement of Charles R. Dreher, attached to Spanish's July 26, 1993 Comments, wherein Mr. Dreher acknowledges that the interference to WCTH(FM) occurs within a mile or less from the tower that is being used jointly by WZMQ(FM) and WKLG(FM). The WZMQ(FM)/WKLG(FM) tower is currently located approximately 19 kilometers from the WCTH(FM) transmitter site. The present situation thus presents an almost classic example of circumstances under which RITOI interference *can* come into being. Merely by moving its transmitter on its presently-authorized frequency, Key Largo could unilaterally eliminate the RITOI problem.

Moreover, if it were deemed essential that Spanish change frequencies to eliminate the RITOI interference, this change could be effectuated while at the same time permitting the changes proposed in the Joint Counterproposal. Specifically, as is explained in the attached Technical Exhibit, Channel 288C2 could be substituted for Channel 280C2 at Key Largo, Florida, at the reference coordinates proposed by Spanish. No change would be required at Marathon.⁷ The changes proposed in the Joint Counterproposal could all then be effectuated.⁸

IV. **Conclusion**

Vero Beach supports the adoption of the Joint Counterproposal advanced by Okeechobee, Sunshine and JBC in this proceeding. Not only would the Joint Counterproposal permit the increased coverage indicated by the proponents of the Joint Counterproposal, but it would also permit WWDO(FM) the opportunity to improve its coverage so as to serve an additional 66,479 persons. Balanced against the substantial improvement in service that could be achieved if the Joint Counterproposal were adopted is the fact that Spanish does not even claim that it would be able to achieve additional coverage through adoption of its proposal. While Spanish asserts that the adoption of its proposal is necessary to overcome RITOI interference being inflicted on WCTH(FM), the simple fact of the matter is that such interference can be

⁷ Marathon would still be free to pursue an upgrade to Channel C3 on its present frequency.

⁸ Vero Beach is not setting forth this option as a counterproposal to the Spanish proposal. Instead, it is merely suggesting an alternative way of accomplishing the results that are sought by Spanish and the Joint Counterproposal. In fact, as has been pointed out above, there is no need to substitute channels at Key Largo given the fact that the RITOI interference can be eliminated without a channel substitution.

more simply remedied simply by Spanish's moving of its facilities, on its current channel, to a site closer to its proposed reference coordinates.

Respectfully submitted,

VERO BEACH FM PARTNERSHIP

By: _____
John M. Pelkey

Its Attorney

HALEY, BADER & POTTS
Suite 900
4350 North Fairfax Drive
Arlington, VA 22203-1633
703/841-0606
August 23, 1993

REPLY COMMENTS
MM DOCKET #93-136
VERO BEACH FM RADIO PARTNERSHIP
WWDO RADIO STATION
VERO BEACH, FLORIDA
August 1993

Technical Exhibit
TE-1

Bromo Communications, Inc.
P.O. Box M - 1331 Ocean Boulevard, Suite 201
St. Simons Island, Georgia 31522
(912) 638-5608

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REPLY COMMENTS
MM DOCKET #93-136
VERO BEACH FM RADIO PARTNERSHIP
WVDO RADIO STATION
VERO BEACH, FLORIDA
August 1993

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Vero Beach FM Radio Partnership ("Vero"), permittee of WVDO, Channel 259C2, Vero Beach, Florida. These comments are in response to a Commission Public Notice relating to the filing of two counterproposals in MM Docket #93-136.

2. The petitioner in MM Docket #93-136 is Spanish Broadcasting System of Florida, Inc. ("Spanish"), licensee of WZMQ, Channel 280C2, Key Largo, Florida. Spanish has requested the three changes in the Table of Allotments in the Florida Keys to eliminate or reduce the potential for receiver-induced third order intermodulation interference being caused in the vicinity of the WZMQ site, which is co-located with WKLG, Channel 271C2, Rock Harbor, Florida. In order to alleviate this interference problem, Spanish proposes to substitute Channel 292C2 for Channel 280C2 at Key Largo, Florida, which in turn requires Channel 288A to be substituted for Channel 292A at Marathon, Florida, and Channel 280C2 to be substituted for Channel 288C2 at Key Colony Beach, Florida.

3. Two parties filed counterproposals to the Spanish requests. The first counterproposal was filed by Key Chain, Inc. ("Key"), licensee of WAVK, Channel 292A, Marathon, Florida, seeking an upgrade to Channel 288C2 at Marathon. WAVK's channel has been proposed to be changed to 288A by Spanish. The second proposal was filed jointly by Okeechobee Broadcasters, Inc. ("OBI"), licensee of WOKC-FM, Channel 276C2, Indiantown, Florida, Sunshine Broadcasting, Inc. ("SBI"), licensee of WSUV, Channel 292A, Fort Myers Villas, Florida, and Jupiter Broadcasting Corporation ("JBC"), permittee of WADY, Channel 258A, Jupiter, Florida, referred to jointly as "Joint Commenters". The Joint Commenters have requested the following changes; the substitution of Channel 276C1 for Channel 276C2 at Indiantown, Florida; the substitution of Channel 292C3 for Channel 276C3 at Naples, Florida; the substitution of Channel 275C2 for Channel 292A at Fort Myers Villas, Florida; the substitution of Channel 258A for Channel 292A at Clewiston, Florida, and the substitution of Channel 292C3 for Channel 258A at Jupiter, Florida. 1

- 1) While the licensee of WAFC-FM has consented to a site change to accommodate Channel 258A at Clewiston, Florida, it would be possible for WAFC-FM to operate on Channel 258A from its authorized site, under §73.215, as a maximum Class A facility. Under §73.207, WAFC-FM, on Channel 258A, would be shortspaced to WJBX, Fort Myers Beach, Florida, on Channel 257C2. However, the WJBX license was granted under §73.215 at the request of the applicant. WJBX operates with 50.0 kilowatts and an antenna height above average terrain of 87 meters. There would be no prohibited overlap of contours between WAFC-FM and WJBX, if WAFC-FM were operated as a 6.0 kilowatt Class A facility.

BACKGROUND

Presently WWDO is shortspaced to Channel 258A at Jupiter, Florida (see Exhibit #1). Channel 259C2 at Vero Beach has a long history of problems related to locating sites due to FCC and FAA regulations. After the institution of §73.215 regulations some other avenues were made available, thus enabling WWDO to locate a site, albeit shortspaced. WWDO remedied the shortage to Channel 258A at Jupiter by reducing its proposed height above average terrain from 150 meters to 98 meters. This reduction was to eliminate any prohibited overlap of contours between WWDO and Channel 258A at Jupiter, Florida.

DISCUSSION

Vero supports the requested change of channels at Jupiter since it potentially will eliminate the shortage to Vero's facility. The removal of Channel 258A at Jupiter would allow WWDO to increase the proposed height above average terrain to 150 meters. Further, it would potentially allow WWDO to relocate its site to a more optimum location, while still allowing for a maximum Class C2 facility at Vero

Beach. 2 At its presently authorized site, WWDO will provide 1.0 mV/m service to 322,519 persons. 3 A maximum Class C2 facility, at this same location, would provide service to an additional 66,479 persons, a 20% increase over the presently authorized facility.

PARTIAL RESOLUTION TO CONFLICTS

5. A portion of the Joint Commenters' requests is mutually exclusive with the Spanish request. Channel 292C3 at Naples, Florida, is shortspaced to the proposed Channel 292C2 allotment at Key Largo, Florida. We have determined that, if an alternate channel was used in the Spanish proposal, it would eliminate the need for the use of Channel 292C2 at Key Largo, thus removing the conflict between the Spanish and the Joint Commenters requests. Channel 288C2 can be substituted for Channel 280C2 at Key Largo, Florida, at the site proposed by Spanish (see Exhibit #2). 4 This will still require that Channel 280C2 be

- 2) The present construction permit for WWDO provides for placement of the antenna system on a cable television tower. If the Jupiter channel change occurred, it would potentially enable the facility to be located elsewhere, vastly reducing or eliminating the potential for interference to the cable facility.
- 3) All population data is based on 1990 Census figures extracted from PL 94-171 files.
- 4) It should be noted that at the site specified by Spanish in its Petition, Channel 280C2 could still be utilized by WZMQ. The site is located 20.43 kilometers distant from the licensed WZMQ site. At this distance, the potential for intermodulation interference

still require that Channel 280C2 be substituted for Channel 288C2, however, no change in Marathon is necessary. WAVK can remain on Channel 292A. 5

Therefore, Vero supports the following changes in §73.202(b) of the Commissions rules;

Key Largo, Florida

Present
280C2

Proposed
288C2

Key Colony Beach, Florida

Present
288C2

Proposed
280C2

Indiantown, Florida

Present
276C2

Proposed
276C1

Naples, Florida

Present
228A,
233C, 276C3

Proposed
228A
233C, 292C3

- 5) While Key has requested an upgrade to Channel 288C2 as a counterproposal to this proceeding, it could potentially upgrade Channel 292 to a C3 channel at Marathon, once this proceeding is concluded, by utilizing recently enacted upgrade by application regulations authorized in MM Docket #92-159. The population difference between maximum C3 and C2 facilities at Marathon are only 4,588 persons. Thus, the public interest benefits might be better served by Vero's suggested alternate channel proposal and adoption of the Joint Commenters requests.

Fort Myers Villas, Florida

Present
292A

Proposed
275C2

Clewiston, Florida

Present
292A

Proposed
258A

Jupiter, Florida

Present
258A, 288A

Proposed
288A, 292C3

The foregoing technical statement was prepared on behalf of Vero Beach FM Radio Partnership by Bromo Communications, Inc., its Technical Consultants. All of the information contained herein is true and accurate to the best of our belief and knowledge. Should questions arise during consideration of this report, we would welcome the opportunity to discuss the matter by phone at (912) 638-5608. All data regarding FM channels was extracted from the NTIA database, as updated on July 1993. We assume no liability for omissions or errors in that database which may be adverse to the requests contained herein.

CLEARANCE STUDY FOR WUDO VERO BEACH, FLORIDA
USING WUDO CONSTRUCTION PERMIT SITE AS REFERENCE

REFERENCE
27 46 38 N
80 27 17 W

CLASS C2
Current rules spacings
CHANNEL 259 - 99.7 MHz

DISPLAY DATES
DATA 07-28-93
SEARCH 08-20-93

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WUDO.C	259C2	Vero Beach	FL	0.0	0.00	190.0	-190.00
CP ZCN	27 46 38	80 27 17	50.000 kW	98M	0.0	118.1	
Vero Beach FM Radio Partnership					BPH-880523MV		
* WTRU.C	258A	Jupiter	FL	160.2	98.63	106.0	-7.37
CP CN	26 56 22	80 07 04	3.000 kW	91M	61.3	65.9	
U.S. Three Broadcasting Corp					BPH-880831IE		
* AP258	258A	Jupiter	FL	158.7	99.02	106.0	-6.98
AP CN	26 56 40	80 05 30	3.000 kW	100M	61.5	65.9	
Jupiter Broadcasting Corp					BPH-890103MD 890727		
>MX with Renewal of WTRU							
WLRQFM	257C2	Cocoa	FL	336.5	60.58	58.0	2.58
CP CN	28 16 42	80 42 03	50.000 kW	150M	37.7	36.0	
Ezy Communications, Inc.					BPH-890515IF		
WLRQFM	257A	Cocoa	FL	336.5	60.58	55.0	5.58
LI CN	28 16 42	80 42 03	1.200 kW	152M	37.7	34.2	
Ezy Communications, Inc.					BLH-870318KB		
WDIZ	262C	Orlando	FL	325.5	110.88	105.0	5.88
LI CY	28 36 08	81 05 37	100.000 kW	362M	68.9	65.3	
Shamrock Communications, Inc.					BMLH-900118KA		

CHANNEL 259C2 SPACING STUDY

* NOTE : CLEARANCE TO CHANNEL 258A IS
BASED ON SECTION 73.215.

EXHIBIT #1

**REPLY COMMENTS
MM DOCKET #93-136
VERO BEACH FM
RADIO PARTNERSHIP
VERO BEACH, FLORIDA
August 1993**

BROMO
COMMUNICATIONS
BROADCAST
TECHNICAL CONSULTANTS
St Simons Island, Georgia
Washington, D.C.

CLEARANCE STUDY FOR KEY LARGO, FLORIDA
USING PROPOSED CHANNEL 292C2 SITE AS REFERENCE

REFERENCE
24 57 20 N
80 34 50 W

CLASS C2
Current rules spacings
CHANNEL 288 -105.5 MHz

DISPLAY DATES
DATA 07-28-93
SEARCH 08-20-93

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD288	288C2	Key Largo	FL	0.0	0.0	190.0	-190.00
AD	24 57 20	80 34 50	0.000 kW	OM	0.0	118.1	
Alternate Channel for Key Largo, FL							
* DE288	288C2	Key Colony Beach	FL	242.5	59.72	190.0	-130.28
DE	24 42 25	81 06 17	0.000 kW	OM	37.1	118.1	
Spanish Broadcasting System					RM8161		921217
* WKKB.C	288C2	Key Colony Beach	FL	242.5	59.72	190.0	-130.28
CP CN	24 42 25	81 06 17	50.000 kW	84M	37.1	118.1	
Richard L. Silva					BPH-920803JO		
AD288	288C2	Naples Park	FL	321.2	193.42	190.0	3.42
AD	26 19 00	81 47 13	0.000 kW	OM	120.2	118.1	
Wodlinger Broadcasting Company					RM8272		930601
WHQT	286C	Coral Gables	FL	18.4	118.04	105.0	13.04
LI DCN	25 57 59	80 12 33	100.000 kW	307M	73.4	65.3	
WIOD, Inc.					BLH-870611KE		
WIXI.C	288C3	Naples Park	FL	321.2	193.42	177.0	16.42
CP ZCN	26 19 00	81 47 13	7.100 kW	181M	120.2	110.0	
Wodlinger Broadcasting					BPH-921125ID		
>From Channel 288A							

ALLOCATION STUDY CHANNEL 288C2

* NOTE : WKKB TO CHANGE TO CHANNEL 280C2.

EXHIBIT #2
REPLY COMMENTS
MM DOCKET #93-136
VERO BEACH FM
RADIO PARTNERSHIP
VERO BEACH, FLORIDA
August 1993

BROMO
COMMUNICATIONS
St Simons Island, Georgia
BROADCAST
TECHNICAL CONSULTANTS
Washington, D.C.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT


State of Georgia)
St. Simons Island)
County of Glynn) ss:

JEFFERSON G. BROCK being duly sworn, deposes and says that he is an officer of Bromo Communications, Inc. Bromo has been engaged by Vero Beach FM Radio Partnership to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 20th day of August, 1993.



Jefferson G. Brock
Affiant

Sworn to and subscribed before
me this the 20th day of August, 1993.



Notary Public, State of Georgia
My Commission Expires: September 8, 1995

CERTIFICATE OF SERVICE

The undersigned, an employee of Haley, Bader & Potts, hereby certifies that the foregoing document was mailed this date by First Class U.S. Mail, postage prepaid, or was hand-delivered*, to the following:

Michael C. Ruger, Esq.*
Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W., Room 8322
Washington, D.C. 20554

Ms. Nancy J. Walls*
Communications Industry Analyst
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Ms. Mary Kay Reich
Commissioner
Plantation Key Government Center
88820 Overseas Highway
Tavernier, FL 33070

A handwritten signature in cursive script, reading "Lucy D. Santagata", written over a horizontal line.

August 23, 1993